IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ABBVIE INC. and ABBVIE BIOTECHNOLOGY LTD., Plaintiffs, v. AMGEN INC. and AMGEN MANUFACTURING LTD., Defendants.	Civil No.: 16-666-SLR-SRF

JOINT MOTION FOR CONFERENCE TO RESOLVE PROTECTIVE ORDER AND DISCOVERY DISPUTES

Plaintiffs AbbVie Inc. and AbbVie Biotechnology Ltd. ("AbbVie") and Defendants Amgen Inc. and Amgen Manufacturing Ltd. ("Amgen") respectfully move this Court to schedule a conference to address outstanding disputes regarding protective order and discovery matters.

In light of previous communications with Chambers, the parties will provide moving submissions of no more than 4 pages total per party by no later than 4:00 p.m. on January 26, 2017, and responsive submissions of no more than 4 pages total per party by no later than 4:00 p.m. on January 27, 2017, in advance of an in-person conference to be held on February 1, 2017 at 3:00 p.m. AbbVie proposes simultaneous briefing on the protective order issues, while Amgen proposes that it is the moving party on those issues and that AbbVie is the responsive party.

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SO ORDERED this __________ day of ________________, 2017.

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United States District Judge